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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN

UNITED STATES OF AMERICA,

Plaintiff,

v.

TIKAWA PIERCE,

Defendant.

Case: 4:22-cr-20529  
Judge: Kumar, Shalina D.  
MJ: Ivy, Curtis  
Filed: 10-19-2022  
SEALED MATTER (tt)

Violations:

18 U.S.C. § 924(c)(1)(A)

18 U.S.C. § 922(g)(1)

21 U.S.C. § 841(a)

**INDICTMENT**

THE GRAND JURY CHARGES:

FILED  
OCT 19 2022  
U.S. DISTRICT COURT  
FLINT, MICHIGAN

**COUNT ONE**

**18 U.S.C. § 924(c)(1)(A) - Possession of a Firearm in Furtherance of a Drug Trafficking Crime**

1. On or about September 24, 2022, in the Eastern District of Michigan, defendant, TIKAWA PIERCE, knowingly possessed a firearm in furtherance of a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, possession with intent to distribute cocaine and cocaine base.

All in violation of Title 18, United States Code, Section 924(c)(1)(A).

**COUNT TWO**

**18 U.S.C. § 922(g)(1) - Possession of a Firearm by a Prohibited Person**

2. On or about September 24, 2022, in the Eastern District of Michigan, defendant, TIKAWA PIERCE, knowing that he had been convicted of a crime

punishable by imprisonment for a term exceeding one year, knowingly possessed, in and affecting interstate and foreign commerce, a firearm, that is, an FN, model Five-seveN, 5.7x28mm caliber, semi-automatic pistol.

All in violation of Title 18, United States Code, Section 922(g)(1).

**COUNT THREE**

**21 U.S.C. § 841(a) - Possession with Intent to Distribute  
Cocaine and Cocaine Base**

3. On or about September 24, 2022, in the Eastern District of Michigan, defendant, TIAKAWA PIERCE, knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of cocaine and a mixture and substance containing a detectable amount of cocaine base, both Schedule II controlled substances.

All in violation of Title 21, United States Code, Section 841(a).

**FORFEITURE ALLEGATIONS**

**18 U.S.C. § 924(d), 21 U.S.C. § 853, and 28 U.S.C. § 2461**

4. The allegations contained in Counts One, Two, and Three of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture pursuant to 18 U.S.C. § 924(d), 21 U.S.C. § 853, and 28 U.S.C. § 2461.

5. Upon conviction of the offenses charged in Count One or Count Two of this Indictment, defendant shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section

2461, any firearm or ammunition involved in said offense including but not limited to an FN, model Five-sevenN, 5.7x28mm caliber, semi-automatic pistol.

6. As a result of violating Title 21, United States Code, as set forth in Count Three of this Indictment, defendant shall forfeit to the United States: (a) any property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of such violations; and (b) any property used, or intended to be used, in any manner or part, to commit or to facilitate the commission of such violations, pursuant to Title 21, United States Code, Section 853(a).

7. Substitute Assets: If the property described above as being subject to forfeiture, as a result of any act or omission of defendant:

- a. Cannot be located upon the exercise of due diligence;
- b. Has been transferred or sold to, or deposited with, a third party;
- c. Has been placed beyond the jurisdiction of the Court;
- d. Has been substantially diminished in value; or
- e. Has been commingled with other property that cannot be divided without difficulty;

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461(c).

THIS IS A TRUE BILL  
*s/Grand Jury Foreperson*

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GRAND JURY FOREPERSON

DAWN N. ISON  
United States Attorney

*s/Anthony Vance*  
\_\_\_\_\_  
ANTHONY VANCE  
Chief, Branch Offices

*s/Ann Nee*  
\_\_\_\_\_  
ANN NEE  
Assistant United States Attorney

Dated: 10-19-2022

<b>United States District Court Eastern District of Michigan</b>	<b>Criminal Case Cover</b>
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately

<b>Companion Case Information</b>	<b>Companion Case Number:</b>
This may be a companion case based on LCrR 57.10(b)(4) <sup>1</sup> :	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<b>AUSA's Initials: AN</b>

**Case Title:** USA v. Tiakawa Pierce

**County where offense occurred:** Genesee

**Offense Type:** Felony

Indictment – no prior complaint

### Superseding Case Information

**Superseding to Case No:** \_\_\_\_\_ **Judge:** \_\_\_\_\_

**Reason:**

Defendant Name

Charges

Prior Complaint (if applicable)

**Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case**

October 19, 2022

Date

s/Ann Nee

Ann Nee  
 Assistant United States Attorney  
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<sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated